

5. The facts relayed above are based both on my recollection, and on detailed notes that I prepared for my attorney on March 28, 2013 immediately following my discussion with the FBI. Because my notes were created for the purpose of communicating with my counsel and seeking advice, they are protected by the attorney-client privilege and I will not disclose them at this time.

6. I wish to reiterate that, had I known that I purchased 700,000 shares of Yahoo before my telephone call with Sandeep Aggarwal rather than after the call, I would not have pled guilty in this case.

7. Based on my initial Affidavit and Memorandum of Law in Support of my Motion to Withdraw Guilty Plea, as well as the foregoing and the accompanying Reply Memorandum, I respectfully request that the Court permit me to withdraw my guilty plea.

Dated: Chicago, Illinois
October 6, 2017

Richard Lee

Richard Lee

Subscribed and sworn to before me
this 6th day of October 2017.

mw.

Notary Public

